Shaughnessy No.:114402

Date Out of EAB: MAR 29 1985

To: Dick Mountfort
Product Manager 23
Registration Division (TS-767)

From: Samuel Creeger, Chief
Review Section #1
Exposure Assessment Branch
Hazard Evaluation Division (TS-769)

Attached, please find the EAB review of...

Reg./File # : 359-TNI

Chemical Name: Acifluorfen

Type Product : Herbicide

Product Name : Tackle

Company Name : Rhone-Poulenc

Purpose : Additional data to support decrease in rotational crop interval.

Action Code(s): 166

EAB #(s) : 5290

Date Received: 2/15/85

TAIS Code: 61

Date Completed: 3/28/85

Total Reviewing Time: 0.5 days

Deferrals to:

____ Ecological Effects Branch

____ Residue Chemistry Branch

____ Toxicology Branch

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1. CHEMICAL: Acifluorfen (Tackle Herbicide), MC-10978 Sodium 5-[2-chloro-4-(trifluoromethyl)-phenoxy]-2-nitrobenzoate

2. TEST MATERIAL: ^{14}C-MC-10978

3. STUDY/ACTION TYPE: Accumulation in ("confined") Rotational Crops

4. STUDY IDENTIFICATION:

Hutchinson, C. and M. Jaber. 1984. ^{14}C Tackle (MC-10978) Confined Rotational Crop Study. Wildlife International Ltd. Project No.: 171-107. Solitude Creek Farm, St. Michaels MD. October 30, 1984. 35 pages, 17 tables, 1 figure, 3 appendices, No references.

5. REVIEWED BY:

Typed Name : Emil Regelman
Title : Chemist
Organization: EAB/HED/OPP

Signature: [signature]
Date: 3/28/85

6. APPROVED BY:

Typed Name : Samuel Creeger
Title : Chief
Organization: Review Section #1
EAB/HED/OPP

Signature: [signature]
Date: MAR 29 1985

7. CONCLUSIONS:

The submitted study is unacceptable in support of either the confined accumulation in rotated crops or field accumulation in rotated crops data requirements. These data requirements are still unsatisfied.

8. RECOMMENDATIONS:

The registrant should be requested to submit an acceptable confined (laboratory) accumulation study for all crop groups which might be rotated into treated areas.

The registrant is advised to submit test protocols for our review prior to initiating any new studies. See §10.E for additional comments.

9. BACKGROUND:

A. Introduction

Rhone-Poulenc has submitted a study (in Accession 256167) to support a proposed amendment to the Tackle® label reducing the rotational crop restriction for all crops to eight months from the current one year.

Two previously submitted studies (Dynamac review of 8/26/83) were found to be scientifically valid but inadequate to support the confined accumulation data requirement. The two most notable deficiencies, low rates of application relative to the proposed application rate and failure to adequately identify metabolites (the primary purpose of this data requirement) were partially addressed in the 6/25/84 review. However, the confined accumulation in rotated crops data requirement has still not been satisfied

Tentatively identified residues in wheat planted 12 months after treatment at 0.16 lb ai/A (ASD Report # 82/046) included parent Acifluorfen, MC-10879 and MC-10074. In addition, MC-10108 and MC-14621 could have been present, but confirmation was not made due to inadequate methodology.

B. Directions for Use

A copy of the proposed label (with amendments) is appended to this review.

10. DISCUSSION OF INDIVIDUAL TESTS OR STUDIES:

A. Study Identification

See §4, above.

B. Materials and Methods (Protocols)

1. Test Method

a. Description of Protocol, etc.

b. Description of Chemical method used.

C. Reported Results

This study will not be reviewed in detail at this time. See § E., below, for details.

D. Study Author's Conclusions/Quality Assurance Measures

E. Reviewer's Discussion and Interpretation of Study Results

This study will not be reviewed in detail at this time, for the following reasons:

1. The submitted study was not a confined (laboratory) study as required by the guidelines; rather, it appeared to be a small-plot field study.

2. In any case, massive crop failures in virtually all crops planted resulted in only minimally useful conclusions.

3. No attempt was made to identify and/or quantitate any of the degradates tentatively identified in the earlier studies, despite the fact that radioresidues were detected in some of the crops which survived.

11. COMPLETION OF ONE-LINER:

No additional data have been added to the onging one-line data summary.

12. CBI APPENDIX:

There is no CBI appendix to this review.